

EXHIBIT 7

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	Honorable Marianne O. Battani
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	:	
In re: BEARINGS CASES	:	
	:	
	:	
	:	
	:	
THIS DOCUMENT RELATES TO:	:	
	:	2:12-cv-00503-MOB-MKM
END-PAYOR ACTIONS	:	
	:	

**OBJECTIONS AND RESPONSES OF NTN CORPORATION TO END-PAYOR
PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO THE NTN DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Local Rule 26.1 of the United States District Court for the Eastern District of Michigan, Defendant NTN Corporation (“NTN Corp.”) hereby objects and responds to End-Payor Plaintiffs’ (“EPPs” or “Plaintiffs”) First Set of Requests for Production of Documents to the NTN Defendants, dated June 15, 2015 (the “Requests”). Use of the term “NTN Defendants” is made only in reference to the title of the document served on NTN Corp. and NTN USA Corporation (“NTN USA”) and in no way implies that the two corporations are a single entity.

PRELIMINARY STATEMENT

The following objections and responses are based upon the documents currently known and available to NTN Corp. Discovery and investigation are in the preliminary stages and are ongoing, and may disclose the existence of additional facts or documents, add meaning to known facts or documents, or lead to additions, variations, or changes to these objections and responses.

RESPONSE REQUEST FOR PRODUCTION NO. 71:

NTN Corp. incorporates its general objections as if fully set forth herein. In addition to its general objections, NTN Corp. objects to Request No. 71 on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and duplicative of other Requests. NTN Corp. further objects to this Request insofar as it seeks documents not currently in NTN Corp.'s possession, custody, or control, or refers to persons, entities, or events not known to it or controlled by it. NTN Corp. further objects to this Request to the extent it seeks information regarding products that neither were sold by NTN Corp. in the United States nor had the requisite effect on commerce or trade in the United States, including that NTN Corp.'s sales of Bearings to third parties outside the United States would not have a direct effect on United States commerce as required by the FTAIA because, among other things, NTN Corp. had no control over how the Bearings were subsequently priced, used, or sent and thus such Request is unduly burdensome and irrelevant to this action. NTN Corp. further objects to this Request on the grounds that the undefined term "value engineering pricing" is vague, ambiguous, confusing, and subject to numerous possible interpretations.

Subject to and without waiving the foregoing general and specific objections, NTN Corp. is willing to meet and confer with EPPs to determine the scope of this Request as well as the foregoing objections, and potential means, if any, of addressing them. Subject to determination of the proper scope of this Request, NTN Corp. will produce non-privileged documents responsive to this Request to the extent they are located in the course of a reasonable search of the electronic files of agreed-upon custodians.

REQUEST FOR PRODUCTION NO. 72:

All Documents related to Your or other Defendants' negotiations or communications

with any customer or potential customer in connection with the facts described in the Complaints for the Relevant Product and Documents You or any other Defendant provided to any customer or potential customer, in connection with the facts described in the Complaints for the Relevant Product.

RESPONSE REQUEST FOR PRODUCTION NO. 72:

NTN Corp. incorporates its general objections as if fully set forth herein. In addition to its general objections, NTN Corp. objects to Request No. 72 on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and duplicative of other Requests. NTN Corp. further objects to this Request insofar as it seeks documents not currently in NTN Corp.'s possession, custody, or control, or refers to persons, entities, or events not known to it or controlled by it.

NTN Corp. further objects to this Request to the extent it seeks information regarding products that neither were sold by NTN Corp. in the United States nor had the requisite effect on commerce or trade in the United States, including that NTN Corp.'s sales of Bearings to third parties outside the United States would not have a direct effect on United States commerce as required by the FTAIA because, among other things, NTN Corp. had no control over how the Bearings were subsequently priced, used, or sent and thus such Request is unduly burdensome and irrelevant to this action. NTN Corp. further objects to this Request on the grounds that the undefined term "potential customer" is vague, ambiguous, confusing, and subject to numerous possible interpretations.

Subject to and without waiving the foregoing general and specific objections, NTN Corp. is willing to meet and confer with EPPs to determine the scope of this Request as well as the foregoing objections, and potential means, if any, of addressing them. Subject to determination of the proper scope of this Request, NTN Corp. will produce non-privileged documents

responsive to this Request to the extent they are located in the course of a reasonable search of NTN Corp.'s electronic centralized files.

REQUEST FOR PRODUCTION NO. 73:

All documents relating to the structure of Your organization, including without limitation documents specifying Your employees, officers, and directors, as well as departments, divisions, and committees and the members of each during the relevant time period. Such documents include without limitation organizational charts.

RESPONSE REQUEST FOR PRODUCTION NO. 73:

NTN Corp. incorporates its general objections as if fully set forth herein. In addition to its general objections, NTN Corp. objects to Request No. 73 on the grounds that it seeks documents that are not relevant to any party's claims or defenses and are not likely to lead to the discovery of admissible evidence. NTN Corp. further objects to Request No. 73 on the grounds that it is overly broad, unduly burdensome, vague, ambiguous, and duplicative of other requests.

Subject to and without waiving the foregoing general and specific objections, NTN Corp. is willing to meet and confer with EPPs to determine the scope of this Request as well as the foregoing objections, and potential means, if any, of addressing them. Subject to determination of the proper scope of this Request, NTN Corp. will produce non-privileged documents responsive to this Request to the extent they are located in the course of a reasonable search of NTN Corp.'s electronic centralized files.

REQUEST FOR PRODUCTION NO. 74:

All documents relating to the structure of Your company, including without limitation documents specifying any parent company, subsidiaries, and/or affiliates, and the percentage You own of each subsidiary and the percentage ownership interest Your parent company has in Your company if applicable.

RESPONSE REQUEST FOR PRODUCTION NO. 74: